

Frank A. Scanga, Esq. (FS 1460)
477 Madison Avenue
21st Floor
New York, New York 10022
(212) 758-4040

Attorney for Defendant:
Southbridge Towers, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

-----X **21 MC 102(AKH)**
WALTER GALLEGOS,

Plaintiff(s),

07CV4467 (AKH)

-against-

NOTICE OF ADOPTION OF
ANSWER TO MASTER
COMPLAINT

120 BROADWAY CONDOMINIUM, et al.

Defendant(s).

-----X

PLEASE TAKE NOTICE that Defendant, SOUTHBIDGE TOWERS, INC. (hereinafter referred to as "SOUTHBIDGE TOWERS") by it's attorney, Frank A. Scanga, Esq., as and for their response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, hereby adopts it's Answer to the Master Complaint dated, filed and served October 3, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). The responses to all of the allegations in the Master Complaint are adopted herein and are applicable to the Check-Off Complaint served and filed herein.

PLEASE TAKE FURTHER NOTICE that defendant, SOUTHBIDGE TOWERS,

reserves the right to serve and file an amended answer and specifically reserves the right to interpose a cross-claim against any and all co-defendants.

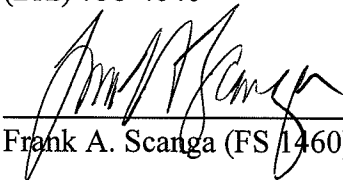
PLEASE TAKE FURTHER NOTICE that defendant, SOUTHBRIDGE TOWERS, also adopts all affirmative defenses and the jury demand herein.

WHEREFORE, the defendant, SOUTHBRIDGE TOWERS demands judgment dismissing the above-captioned actions as against it together with it's costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
October 3, 2007

FRANK A. SCANGA, ESQ.
Attorney for Defendants,
Southbridge Towers, Inc.
477 Madison Avenue
21st Floor
New York, New York 10022
(212) 758-4040

By:


Frank A. Scanga (FS 1460)

To: Worby Groner Edelman & Napoli Bern
115 Broadway, 12th Floor
New York, NY 10006
(212) 267-3700

Robert A. Grochow, Esq.
233 Broadway, 5th Floor
New York, New York 10279
(212) 608-4400

Gregory J. Cannata, Esq.
233 Broadway, 5th Floor
New York, New York 10279
(212) 553-9206